

FILED

U.S. MAGISTRATE JUDGE

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Attorneys for the United States of America

DATE: March 4, 2022

TIME: 7:45 p.m.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW WADE BEASLEY,

Defendant.

Case No. 2:22-mj- 00171-EJY

COMPLAINT for violation of:

ASSAULT ON A FEDERAL OFFICER
(18 U.S.C. § 111(a)(1) and (b))

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
Complainant, being duly sworn, deposes and states:

COUNT ONE

Assault on a Federal Officer
(18 U.S.C. § 111(a)(1) and (b))

1. On or about March 3, 2022, in the State and Federal District of Nevada,
MATTHEW WADE BEASLEY,
defendant herein, unlawfully and knowingly did forcibly assault, resist, oppose, impede,
intimidate, and interfere with Federal Bureau of Investigation Special Agents J.M., G.C.,
and R.S., persons designated in 18 U.S.C. § 1114, while those agents were engaged in and

1 on account of the performance of the agents' official duties, using a deadly and dangerous
2 weapon, all in violation of 18 U.S.C. § 111(a)(1) and (b).

3 Complainant, Brandon Kam, states the following as and for probable cause:

4 2. I am a Special Agent with the Federal Bureau of Investigation (FBI), I
5 have been so employed since March 2019 and I am currently assigned to the FBI Las
6 Vegas Division Safe Streets Task Force. I am presently assigned to work on
7 investigations and cases involving drugs, guns, gangs and violent crimes. During my
8 career as an FBI Agent, I have also been assigned to a Joint Terrorism Task Force with
9 the responsibility of investigating threat to life matters.

10 3. The statements contained in this affidavit are based on an FBI and Las
11 Vegas Metropolitan Police Department investigation in which I have been personally
12 involved and also includes information obtained from other law enforcement officials
13 involved in the investigation. I have not included each and every fact known to me
14 concerning this investigation, rather I have included only those facts I believe are
15 necessary to establish probable cause to support this complaint.

16 Probable Cause

17 4. On March 3, 2022, FBI Special Agents J.M., G.C., and R.S. proceeded to
18 a residence located on Ruffian Road in Las Vegas, Nevada, to interview MATTHEW
19 WADE BEASLEY for an ongoing investigation. The agents arrived at the residence at
20 approximately 1:25 p.m.

21 5. Agents J.M. and G.C. wore suits while Agent R.S. was dressed casually.
22 Upon arrival at the front of the residence, Agent J.M. rang the Ring doorbell, which
23 appeared to be equipped with a camera. After pressing the Ring doorbell, the agents
24

1 proceeded through an unlocked gate by pushing it open, into what appeared to be a
2 courtyard that led them to the front door of the residence.

3 6. Agent R.S. knocked on the front doors, which were glass French doors.
4 BEASLEY appeared, standing so that only the right half of his body was visible through the
5 glass doors. BEASLEY pointed to Agent J.M. while tapping his right waist with his right
6 hand from behind the closed glass doors.

7 7. Agent J.M. believed BEASLEY wanted to see Agent J.M.'s badge, so Agent
8 J.M. pulled back his suit jacket to show BEASLEY his FBI badge.

9 8. BEASLEY then stepped into complete view and the agents could see that
10 BEASLEY held a firearm in his left hand that was pointed at the left side of BEASLEY's
11 head.

12 9. Agent J.M. stepped back and yelled "easy, easy," while another Agent yelled
13 "drop the gun." Instead of dropping the firearm, BEASLEY then pointed the firearm at the
14 agents in a sweeping motion, causing one or more agents to discharge their firearm, striking
15 BEASLEY. BEASLEY then barricaded himself inside the residence.

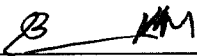
16 10. Agent J.M. was in fear of being harmed by BEASLEY's action and felt that
17 there was an imminent danger of death or serious physical injury to himself and the other
18 agents present. Based on BEASLEY's actions, Agent J.M. believed that BEASLEY was
19 trying to impede and interfere with the agents' law enforcement duties.

20 11. I reviewed portions of an audio recording between BEASLEY and an FBI
21 negotiator who later attempted to convince BEASLEY to leave his residence. The following
22 does not reflect the conversation in its entirety nor is it verbatim. BEASLEY appeared to be
23 anticipating that the FBI would be arriving at his residence. For instance, BEASLEY
24 indicated that the FBI had already been to an associate's house and that he knew "they," in

1 an apparent reference to the FBI, were coming to his house sooner or later. BEASLEY also
2 said that "they," this time in an apparent reference to Agents J.M., G.C., and R.S., did not
3 do anything wrong. Based on my training and experience and these circumstances, I believe
4 the statements made by BEASLEY indicate he was waiting with a firearm for law
5 enforcement to arrive in order to resist, oppose, impede, intimidate, and interfere with FBI
6 Special Agents J.M., G.C., and R.S. while those agents were engaged in and performing
7 their official duties.

8 Conclusion

9 12. Based on the above, I believe there is probable cause to believe that on or
10 about March 3, 2022, BEASLEY assaulted federal officers J.M., G.C., and R.S. in
11 violation of 18 U.S.C. § 111(a)(1) and (b) by pointing a firearm at the three FBI agents.

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13 
14 BRANDON KAM
Special Agent, Federal Bureau of Investigation

15 Attested to by the applicant in accordance with the requirements
16 of Fed. R. Crim. P. 4.1 by telephone on March 4, 2022.

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18 HONORABLE ELAYNA J. YOUCHAK
UNITED STATES MAGISTRATE JUDGE
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